



September 01, 2011

US EPA RECORDS CENTER REGION 5



467827

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Subject: Response to "Transmittal of Review Comments *Additional Excavation of DS Tributary Work Plan Addendum*"
Detrex Source Control Area - Fields Brook Superfund Site
Detrex Corporation, Ashtabula, Ohio
Docket No. V-W-98-C-450

Dear Mr. Thompson:

On behalf of Detrex Corporation (Detrex), and in response a letter dated August 29, 2011 from the United States Environmental Protection Agency (USEPA) supplying comments from SulTRAC Inc. (SulTRAC) based on their review of the above mentioned document, URS Corporation (URS) has prepared the following response letter. USEPA comments are provided in ***bold italic***, followed by the Detrex response.

GENERAL COMMENTS

General Comment #1 - EPA should be informed of the field work schedule at least one and preferably two weeks before field work is to begin so that EPA, EPA's contractor, and/or the Ohio Environmental Protection Agency (Ohio EPA) can provide oversight.

Detrex Response:

Detrex agrees and will provide USEPA with notification of the start of planned field work as soon as the schedule has been finalized. With this letter Detrex is notifying USEPA that the proposed CCTV work and eastern DS Tributary sampling is tentatively scheduled for the week of September 12, 2011.

General Comment #2 - If surface water is present, consideration should be given to collecting surface water samples from the same locations as the sediment samples. Surface water samples should be analyzed for the same parameters as the sediment samples (volatile and semi-volatile organic compounds), and field notes should clearly indicate if non-aqueous phase liquid (NAPL) is present in each water sample. This information will allow better evaluation of the results that the Fields Brook Action Group (FBAG) presented in its July 2011 meeting with EPA. (Detrex was not present at this meeting).

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Detrex Response:

Detrex agrees and will collect surface water samples at the same locations as the sediment samples. The DS Tributary Work Plan Addendum has been revised to reflect the inclusion of surface water sampling. A copy of the revised Work Plan is provided as **Attachment 1**. Further, URS field notes will reflect all pertinent observations from the reconnaissance and sampling efforts, as is standard protocol.

General Comment #3 - In its July 2011 presentation, FBAG identified two "new" areas requiring investigation: (1) the "Detrex Ditch" parallel to the north Detrex property line but south of both the DS Tributary and the rail spur and (2) a 12- to 14-inch-diameter sewer line that discharged to the DS Tributary at a point in the culvert under State Road and the rail spur. In addition to the work proposed for the DS Tributary east of State Road, a similar investigation should be performed for the "Detrex Ditch" identified by FBAG in its July presentation and in Figure 1 of the work plan addendum. Detrex and URS also should be prepared to collect additional "samples of opportunity" of soil, sediment, water, or NAPL identified during the investigation. The location(s) of these sample(s) should be determined in the field by Detrex, URS, EPA, and EPA's contractor in consultation.

Detrex Response:

As presented in the DS Tributary Work Plan Addendum, Detrex intends to investigate the 14-inch sewer line that was identified in the July 2011 FBAG presentation using the CCTV survey coupled with field reconnaissance activities. A field reconnaissance effort will be completed in the area referred to by FBAG as the "Detrex Ditch" along with USEPA and USEPA's contractor. Based on a review of the map provided by FBAG and preliminary reports from Detrex personnel, the ditch is located on Detrex property and is within the storm water collection system installed at the site in 1989. The location of the July 2011 FBAG sampling point 11F3016-02 is on Detrex property and in an area of known impacts that collects site runoff prior to treatment and discharge. Based on previous sampling, this area is known to be contaminated; therefore, no further sampling in the "Detrex Ditch" area is needed.

It is also noted that at the FBAG sampling location, the concentration of chlorinated compounds is significantly lower than established Sediment Confidence Removal Goals (CRGs) used at the Fields Brook Site. The map provided by FBAG showed total chlorinated VOCs, but failed to list individual compounds of concern. Based on a review of the laboratory analytical report, the concentration of trichloroethene (TCE) was reported at 65 µg/kg, as compared to a CRG of 1,854 mg/kg. Also, the concentration of tetrachloroethene (PCE) was reported at 850 µg/kg, as compared to a CRG of 392 mg/kg. Hexachlorobenzene (HCBz) was reported at 1,100 µg/kg, as compared to a CRG of 39 mg/kg. Copies of the laboratory analytical report are attached.

The DS Tributary Work Plan Addendum has been revised to reflect this comment response. A copy of the revised Work Plan is provided as **Attachment 1**.



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SPECIFIC COMMENTS

Specific Comment #1 - Page 2, Scope of Work for Additional Investigations, Bullet 1: In addition to the work outlined in this bulleted item, a similar investigation should be performed for the "Detrex Ditch" identified by FBAG in its July presentation and in Figure 1 of the work plan addendum if the ditch's location and presence can be verified.

Detrex Response:

Detrex agrees as noted in the above response to *General Comment #3*. The DS Tributary Work Plan Addendum has been revised to reflect the inclusion of field reconnaissance of the "Detrex Ditch" area. A copy of the revised Work Plan is provided as **Attachment 1**.

Specific Comment #2 - Page 3, Paragraph 3: Depending on results of the closed-circuit television (CCTV) investigation, additional investigation should be conducted for (1) the "14-inch line" identified by FBAG in its July 2011 presentation and shown in Figure 1 of the work plan addendum and (2) other features identified during the CCTV investigation. The investigation should be conducted to investigate the origin of the "14-inch line" if the CCTV inspection fails to identify its origin.

Detrex Response:

Detrex agrees that the results of the CCTV investigation will determine if further investigation of the 14-inch sewer line is required, as well as potential further investigation of other features identified during the CCTV survey. However, at this time it is not possible to ascertain what further investigation would be required. Therefore, Detrex is proposing to outline and address any potential additional investigation needs as part of the DS Tributary Investigation reporting. The DS Tributary Work Plan Addendum has been revised to reflect this revision. A copy of the revised Work Plan is provided as **Attachment 1**.

Specific Comment #3 - Page 3, Paragraphs 4 and 5: If signs of contamination are found during the field reconnaissance, the sediment augering program proposed for 75-foot intervals should be modified to include these other locations. Visual reconnaissance and field screening sampling should be conducted at these locations even if they do not fall at the 75-foot intervals. Additionally, if the "Detrex Ditch" can be identified, it should undergo an investigation and sampling similar to that proposed for the DS Tributary east of State Road.

Detrex Response:

Detrex agrees and will be prepared to incorporate additional sampling locations based on field reconnaissance observations. With respect to the "Detrex Ditch", the area has been sampled historically and is known to be contaminated. As previously described the data collected by FBAG do not reflect any exceedances to established Fields Brook CRGs. At this time, no further sampling is planned for the "Detrex Ditch" area. The DS Tributary Work Plan Addendum has been revised to reflect the inclusion of field reconnaissance and potential sampling in the purported "Detrex Ditch", if necessary. A copy of the revised Work Plan is provided as **Attachment 1**.



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Detrex believes that the responses included herein, address the comments presented in the USEPA letter dated August 29, 2011. The completion of the field activities outlined in the revised DS Tributary Work Plan Addendum will provide the necessary additional data to evaluate conditions in the Eastern portion of the DS Tributary. Detrex looks forward to agency approval of the Final Work Plan Addendum and the successful completion of the outlined field activities as soon as practicable.

If you have any questions regarding this submittal, please do not hesitate to contact me at 216-622-2432 at your convenience.

Sincerely,

URS Corporation - Ohio

A handwritten signature in black ink, appearing to read "Martin L. Schmidt".

Martin L. Schmidt, Ph.D.
Vice President

Enclosures – Revised DS Tributary Work Plan Addendum & Figure
July 2011 FBAG Laboratory Analytical Report

cc: R. Currie – Detrex Corporation
T. Steib – Detrex Corporation
T. Doll - Detrex Corporation
D. Gray – URS Corporation
R. Williams – Ohio EPA
W. Earle – SulTRAC
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